

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
Western District of Texas

Filed 2/25/11  
Clerk, U. S. District Court  
Western District of Texas

By [Signature]  
Deputy

United States of America

v.

Roel

Raul Chapa (1)

Erma Garcia (2)

Felix Garcia (3)

Gabriel Garcia (4)

Case No. SA-11-172M (1, 2, 3, 4, )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 24, 2011 in the county of Bexar in the  
WESTERN District of TEXAS, the defendant(s) violated:

## Code Section

Title 21, United States Code  
Section 841(a)(1) and 841(b)(1)(B)

## Offense Description

conspiracy to possess with intent to distribute more than 500 grams of a  
mixture or substance containing methamphetamine, a Schedule I Controlled  
Substance., Sections 846, 841(a)(1) and 841(b)(1)(A).

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

[Signature]

Complainant's signature

JESSE ALLEN, Detective, S.A.P.D.

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/25/2011

[Signature]

Judge's signature

City and state:

San Antonio, Texas

PAMELA A. MATHY, U.S. MAGISTRATE JUDGE

Printed name and title

### AFFIDAVIT

I, Jesse Allen, am a Detective with the San Antonio Police Department. I have been a member of the San Antonio Police department for approximately 16 years. In my capacity as a SAPD detective, I came to investigate ROEL CHAPA, ERMA GARCIA, FELIX GARCIA and GABRIEL GARCIA. In the course of my investigation, I became aware of the following facts:

Based on information provided by a previously reliable confidential informant on February 23, 2011, I initiated surveillance at residences located at 1080 Indian Bend and 1227 Tinson, both located in San Antonio, Texas and within the Western District of Texas. According to the informant, cocaine was being stored at the Tinson address. According to the source, GABRIEL was storing cocaine at the Tinson address, and would also store cocaine at the Indian Bend address as well in order to not lose all of the narcotics. According to the informant, GABRIEL GARCIA was selling large quantities of narcotics out of the residences, and would order additional amounts from family members.

On February 24, 2011, I initiated surveillance on both residences. Surveillance and records checks confirmed the source information that connected GABRIEL GARCIA to the Tinson residence. The property was in the name of FELIX GARCIA and ERMA GARCIA. GABRIEL GARCIA was also residing at the 1227 Tinson according to law enforcement data bases. GABRIEL GARCIA was also observed at the properties during surveillance. Based upon this information, I obtained a search warrant for 1227 Tinson. The search warrant was executed at approximately 1:15 a.m. on February 25, 2011.

A search of the residence revealed that eight small bags of cocaine weighing 14 grams, and three bags of methamphetamine weighing 11 grams in the room the furthest to the left upon entry of the house. ROEL CHAPA claimed to be the occupant of that room. ROEL CHAPA said that was all that would be found. ROEL CHAPA claimed ownership of the narcotics that were in that room.

Next, I conducted a search of the middle bed room. In this room, which was like a spare bedroom, I found a cooking pan that contained 189 grams of methamphetamine. The pan was located underneath the bed.

Next I conducted a search of the kitchen area. In the kitchen, officers located two small baggies that contained 7 grams of methamphetamine. I also located multiple other baggies that contained residue that were located in a blender box. I also found a substance that I know to be a cutting agent located in the kitchen. There were also a number of vacuum seal bags that were stored in the dishwasher. There was also a digital scale in the kitchen. These items are known to me in my training and experience to be used to package and distribute narcotics. Additionally, I found documents in the kitchen which were addressed to each of the defendants, ROEL CHAPA, ERMA GARCIA, FELIX GARCIA and GABRIEL GARCIA at the 1227 Tinson address.

Subsequently, a search of the garage revealed a hydraulic press which is used by narcotics traffickers to package narcotics. A form, which is used to make bricks of narcotics, was also found in the garage.

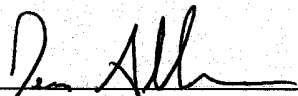
In the master bedroom, a vacuum seal bag, similar to those found in the dishwasher, was

found which contained 189 grams of cocaine. According to FELIX GARCIA and ERMA GARCIA, this bedroom belonged to them.

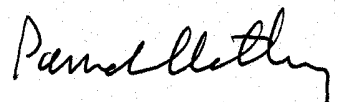
A search of a shed in the backyard revealed a gray cooler that contained more vacuum sealed bags. Contained within the bags was 361 grams of methamphetamine.

The total amount of narcotics found at the Tinson property was 568 grams of methamphetamine and 203 grams of cocaine. These amounts are consistent with distribution. All of the substances were field tested and were positive for the properties of the substances identified herein.

FURTHER AFFIANT SAITH NOT.

  
\_\_\_\_\_  
JESSE ALLEN  
Detective, SAPD

SIGNED and Sworn before me this 25<sup>th</sup> day  
of January, 2011.

  
Pamela L. Hodge  
U.S. Magistrate Judge